

Appendix 1



Children, Young People & Adult at Risk
Safeguarding Policy and Procedures

2021-23

| | |
|------------------|---|
| Version Control | Version 3 |
| Status of Policy | FINAL |
| Sponsor | Chief Executive |
| Author/Reviewer | Glen Channer |
| Approved | |
| Review Date | Full review June 2022 with annual reviews of new legislation and practice. Appendices to be updated quarterly |
| | |

Contents

PART 1 POLICY..... 0

1. Introduction 0

2. Safeguarding Policy Statement 0

3. Equality and Diverstiy 0

4. Definitions..... 1

5. Aims..... 2

| | | |
|------|---|----|
| 6. | Scope of the Policy..... | 3 |
| 7. | Obligations and responsibilities..... | 4 |
| 7.1. | Children and young people..... | 4 |
| 7.2. | Adults at risk..... | 5 |
| 8. | Housing..... | 6 |
| 9. | Disclosure and Barring Service checks..... | 7 |
| 10. | Recognising potential incidences of abuse..... | 7 |
| 11. | Domestic Abuse..... | 7 |
| 12. | Child Sexual Exploitation..... | 8 |
| 13. | Female Genital Mutilation (FGM)..... | 8 |
| 14. | Forced Marriage..... | 8 |
| 15. | Honour Based Abuse..... | 9 |
| 16. | Radicalisation and Violent Extremism..... | 9 |
| 17. | Capacity and Self Determination..... | 9 |
| 18. | Modern Slavery and Human Trafficking..... | 10 |
| 19. | Responsibility, Monitoring and Review..... | 11 |
| | PART TWO: PROCEDURE..... | 0 |
| 1. | Prevention..... | 0 |
| 1.1. | Safe Working Practice..... | 0 |
| 1.2. | Safe working procedures..... | 1 |
| 1.3. | Operational Procedures and Standards..... | 1 |
| 1.4. | First Aid and accidents..... | 2 |
| 1.5. | Photography..... | 2 |
| 1.6. | Off Duty Contact..... | 3 |
| 1.7. | Breach of safe working practice and procedures..... | 3 |
| 2. | Recognise, Respond, Refer..... | 3 |
| 2.1. | Recognise - How?..... | 3 |
| 2.2. | Child Sexual Exploitation..... | 4 |
| 2.3. | Forced Marriage and Honour Based Abuse..... | 5 |
| 2.4. | Female Genital Mutilation..... | 5 |
| | | 1 |

| | | |
|------|---|----|
| 2.5. | Prevent – Radicalisation and Violent Extremism | 6 |
| 2.6. | Financial abuse – Adults at risk..... | 6 |
| 2.7. | Modern Slavery and Human Trafficking | 7 |
| 2.8. | Dealing with threats of suicide | 8 |
| 3. | Respond and refer – How? | 8 |
| 4. | Allegations against members, employees, volunteers or contracted service providers..... | 10 |
| 5. | Dealing with other allegations | 11 |
| 6. | ICT including Internet and email..... | 11 |
| 7. | Complaints | 11 |
| 8. | Dealing with malicious accusations | 11 |
| 9. | Confidentiality..... | 11 |
| 10. | Sharing of information | 12 |
| 11. | Dealing with the Media..... | 13 |
| 12. | Safe Recruitment, Contracts, Grants and Commissioning..... | 13 |

PART 1 POLICY

1. Introduction

Children, young people and adults at risk have the right to participate, have fun and be safe, in the services provided for them and the activities they, or a child's parent, choose for them.

Watford Borough Council will work with Hertfordshire County Council who is the lead safeguarding agency for children, young people and adults at risk. The Council will also work with Hertfordshire's Safeguarding Children and Safeguarding Adults Boards as required under the Children Act 2004, and the amendments made to this Act in the Apprenticeships, Skills, Children and Learning Act 2009, and in line with the multi-agency policy, procedure and practice for working with adults at risk of abuse or neglect in Hertfordshire (January 2017) and the Care Act 2014.

2. Safeguarding Policy Statement

Watford Borough Council is committed to safeguarding children, young people and adults at risk, protecting them from abuse. We will endeavour to keep children, young people and adults at risk safe from abuse and suspicion of abuse, reports will be responded to promptly and appropriately. We will act in the best interest of the child, young person or adult at risk and we will proactively seek to promote the welfare and the protection of all children, young people and adults at risk living in the community at all times.

Watford Borough Council will ensure that unsuitable people are prevented from working with children, young people and adults at risk through its Safe Recruitment procedures and will take any concern reported by a Member, employee, volunteer, grant funded or contracted service provider or child/adult at risk seriously and deal with it sensitively.

Referrals made by a Member, employee, volunteer, grant funded or contracted service provider or child/adult at risk cannot be anonymous and should be made in the knowledge that, during the course of enquiries, the agency and individuals who made that referral will be made known. This is because individuals may be required to give evidence and on occasion be required as a prosecution witness.

Watford Borough Council will not tolerate harassment of any Member, employee, volunteer, grant funded or contracted service provider or child/adult at risk who raises concerns of abuse and it will be addressed through the most appropriate course of action or under the most appropriate policy.

3. Equality and Diversity

We will ensure that this policy is applied fairly and consistently to all our customers. We will not directly or indirectly discriminate against any person or group of people because of their race, religion, age, gender, marital status, sexual orientation, disability or any other grounds set out in our Equality and Diversity policy.

When applying this policy we will act sensitively towards the diverse needs of individuals and communities.

When applying this policy we will take the necessary positive action to reduce discrimination and harassment in local communities.

4. Definitions

For the purpose of this document, the phrase children and young people refers to: Any person under the age of 18 years.

When using the term 'parents' in the context of this document it will be in the broadest sense to include parents, carers and guardians.

The phrase adult at risk refers to: - Any person over the age of 18 who is, or may be in need of care services by reasons of mental health or other disability, age or illness and is, or may be unable to take care of him or herself against significant harm or exploitation. (Lord Chancellor's Department, 1997)

"A violation of an individual's human and civil rights by any other person or persons. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it".

(Department of Health).

Safeguarding children is defined as;

"...protecting children from maltreatment, preventing impairment of children's health and development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes"

Working together to safeguard children 2013¹.

¹ <https://www.childprotectioncompany.com/CPC/news/child-protection-policy/working-together-to-safeguard-children-2013/>

Adult safeguarding is defined by the Care Act 2014² as

“...the process of protecting adults with care and support needs from abuse or neglect”.

The phrase ‘Members, employees, volunteers and grant funded or contracted service providers’ is used to refer to all Borough Councillors (including the Elected Mayor), employees and people working on behalf of the Council either in a paid or voluntary capacity.

Commissioned, contracted or grant funded organisations will be expected to have policies and procedures in place commensurate with the level of contact and involvement with children, young people and adults at risk. As a minimum, any organisation receiving funding from the Council, will be expected to have a statement of policy and procedure regarding safeguarding in place. This needs to be understood by employees and volunteers and available to service users. Commissioned, contracted or grant funded organisations with minimal contact with children and young people may wish to adopt the Council’s Policy.

The phrase ‘contracted service provider’ used subsequently in this document will refer to those organisations that have appropriately adopted this policy.

Abuse can be physical, emotional, sexual and mental including bullying and exploitation, forced marriage, honour based abuse and female genital mutilation. In the case of adults or young people aged 16 and over there are additional areas of financial and domestic abuse.

5. Aims

Watford Borough Council will promote the welfare of children and young people by:

- Respecting the rights, wishes, feelings and privacy of children, young people and adults at risk by listening to them and minimising risks that may affect them.
- Preventing abuse by adopting good practice and creating a safe and healthy environment to avoid situations where abuse or allegations of abuse may occur.
- Ensuring that Members, employees and volunteers understand the relevant Codes of Conduct and Safeguarding Policy.
- Monitoring accountability and governance through the Council’s procedures and through the Community Safety Partnership’s Responsible Officers Group.
- Raising awareness among members and officers of the safeguarding duty the Council has in relation to the Children Act 2004 and the Care Act 2014 where Hertfordshire County Council has the lead responsibility.

² <https://www.legislation.gov.uk/ukpga/2014/23/part/1/crossheading/safeguarding-adults-at-risk-of-abuse-or-neglect/enacted>

- Ensuring that contracted, commissioned and grant funded services have policies and procedures commensurate with the level of involvement they have with children and young people.
- Responding to any allegations appropriately and implementing the appropriate reporting, disciplinary and appeals procedures.
- Supporting the National Prevent agenda by working with partner agencies to identify and support children, young people and adults at risk who are vulnerable to radicalisation.
- Raise awareness about the forms of abuse and how to keep children, young people and adults at risk safe.

To achieve these aims, Watford Borough Council will endeavour to:

- Ensure that training appropriate to the level of involvement with children and young people and adults at risk is available for Members, employees and volunteers and where appropriate contracted service providers which includes training of staff to raise awareness of safeguarding and specific areas such as but not limited to: Child Sexual Exploitation (CSE); Prevent; to identify those vulnerable to radicalisation; Mental Capacity; deprivation of liberties; Forced Marriage; Honour Based Abuse and Female Genital Mutilation
- Respond appropriately to any concerns reported
- Develop and implement effective procedures for recording and responding to incidents and accidents
- Develop and implement effective procedures for recognising, responding, recording and referring any allegations or suspicions of abuse to Hertfordshire County Council and Hertfordshire's Children's Safeguarding Partnership and the District sub group and provide relevant reports.
- Promote the welfare and wellbeing of children, young people and adults at risk within services including in the planning of services.
- Maintain a good level of safe working practice at all times to minimise risk to children, young people and adults at risk that come into contact with Members, employees, volunteers and grant funded and contracted service providers.
- Support all County and National initiatives to promote the Safeguarding of children, young people and adults at risk.
- Hold regular Safeguarding and Safe Working Practice meetings with designated officers from across the Council
- Provide as and when necessary advice and information to increase awareness about keeping safe

6. Scope of the Policy

This Policy and Procedure cover all Members, employees, volunteers and grant funded and contracted service providers (who have appropriately adopted this policy). However, not all Members, employees or volunteers will be working directly with children, young people and adults at risk as part of their duties or activities for or on behalf of the Council. Safe working practices, as detailed in the following procedure, should be used on all occasions where

Members, employees, volunteers or contracted services come into contact with children, young people and adults at risk.

It is always important to use safe working practices but there are some areas when it is of particular importance: -

- Contractors working in our Adventure Playground
- Working in supported housing
- School talks and events
- Work experience placements
- Community engagement including working with youth councils, diversionary activities and events.
- Housing visits for repairs, existing or new housing applicants and homeless families
- Revenue and Benefits home visits
- Visits to any home for inspections or enforcement purposes. This will include all visits eg: Planning, housing repairs, Regulatory Services and grant applications.
- Volunteers training and knowledge as required
- Parks and grounds maintenance
- Anti-social behaviour – enforcement and diversion projects
- Planning and assisting in VIP visits

This list is indicative only and there may be other occasions when particular importance should be paid to safe working practices.

7. Obligations and responsibilities

7.1. Children and young people

The Children Act 2004 imposes a duty on all organisations that have contact with children to ensure they make sufficient arrangements to protect them.

Statutory agencies are required to safeguard and promote the welfare of children.

The Act requires every local authority to establish a Safeguarding Children Board to oversee all work to safeguard children. This duty is undertaken by Hertfordshire County Council.

The Children Act 2004 places responsibilities upon Watford Borough Council, as a relevant partner to Hertfordshire County Council's Children's Services, to safeguard and promote the welfare of children. The Act requires that children have a right to be safe and should be protected from all forms of abuse and neglect. The Act requires that Safeguarding is everyone's responsibility and promotes early intervention. The Act promotes the principle that children and families are best supported and protected when there is a coordinated response from all relevant agencies.

In line with the Children Act 2004 Watford Borough Council must (in section 10) co-operate to improve wellbeing and (in section 11) have arrangements in place to safeguard and promote the welfare of children.

To meet the requirements of section 11 of the Children Act 2004, Watford Borough Council should have regard to statutory guidance 'Working Together to Safeguard Children' (HM Government 2018). The Council has accepted its duty to co-operate with Hertfordshire County Council's Children's Services and it will ensure that it meets the requirements set out by the Hertfordshire Safeguarding Children Partnership. Watford will achieve this by undertaking the following :-

- To have senior level responsibility for Safeguarding Children and Young People. The Managing Director fulfils this role at Watford Borough Council.
- To have a senior officer lead for Safeguarding Children and Young People – Watford have a team of officers responsible for safeguarding which is led by the Head of Community Protection and supported by the Safeguarding Manager.
- An elected member to champion Safeguarding – Watford Borough Council's champion is The Portfolio Holder for Safeguarding.
- Information to be available on intranet Safeguarding and Domestic Abuse folder accessed by quick links on the Safeguarding page.
- All corporate, community and team plans must ensure that safeguarding is a key priority.
- A clear structure must be in place to deal with all issues around safeguarding
- A clear policy on safeguarding must exist and be supported by procedures.
- There should be a clear statement on information sharing with partners with regard to safeguarding.
- There should be an appropriate programme of training for all staff and a full record of training undertaken should be maintained.
- Safe recruitment procedures/guidance should be followed for the recruitment of all staff.
- A whistle blowing policy must be in place and staff should be aware of the procedure – there is an existing whistle blowing policy and a copy is available on the Intranet
- All records relating to children or young people must be stored in a safe and secure place and only named persons should have access to these files.
- Each service area that is responsible for contracting work out on behalf of the Council must ensure that via the service level agreements or contract that the above provisions of section 11 of the Children Act 2004 are complied with.
- Each service area and contract manager is responsible for monitoring compliance by contractors of these provisions and an annual review should be undertaken and reported to the Manager.

7.2. Adults at risk

Hertfordshire County Council is the lead authority for safeguarding Adults at risk. The county council has responsibility for deciding where cases meet the threshold of the Care Act 2014, section 42. Watford Borough Council will support the lead authority in meeting these responsibilities.

The Care Act 2014 supplemented by the Care and Support Guidance (Department of Health 2014) requires Local Authorities including District Councils to “...promote wellbeing when carrying out any of their care and support functions in respect of a person. This may sometimes be referred to as “the wellbeing principle” because it is a guiding principle that puts wellbeing at the heart of care and support” (Care and Support Guidance P1)

Section 1 of the Care Act includes protection from abuse and neglect as part of the definition of wellbeing. Wellbeing is defined in the Guidance in a number of ways and includes protection from abuse and neglect.

The Council is required under statute to promote wellbeing in any function and/or service that involves care and support of adults and meet identified needs. Local authority statutory adult safeguarding duties apply equally to all adults with care and support needs regardless of whether their needs are being met by the local authority.

The guidance enshrines the six principles of safeguarding:

- **Empowerment** – People being supported and encouraged to make their own decisions and informed consent.
- **Prevention** – It is better to take action before harm occurs.
- **Proportionality** – The least intrusive response appropriate to the risk presented.
- **Protection** – Support and representation for those in greatest need.
- **Partnership** – Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.
- **Accountability** – Accountability and transparency in delivering safeguarding.

Watford Borough Council commits to the principles of *Making Safeguarding every one's business* which is about person centred and outcome focussed practice. It is how professionals are assured by adults at risk that they have made a difference to people by taking action on what matters to people, and is personal and meaningful to them.

8. Housing

In discharging a range of duties as Local Housing Authority the Council will have regard to the above obligations and responsibilities.

In addition to this there are also requirements under the following legislation: -

- The Housing Act 1996 as amended by the Homelessness Act 2002 section 213A ensures that a housing authority contacts social services (with or where appropriate without consent) when a family with children is ineligible or intentionally homeless. This section also ensures that housing authorities cooperate with social service to provide advice and assistance to help ineligible or intentionally homeless households with children.

- The Housing Act 2004 gives local authorities powers and duties to take action against bad housing conditions and Environmental Health Officers will assess the impact of health and safety hazards in light of hazards that occupants are vulnerable to and consider safeguarding children as part of this process.

9. Disclosure and Barring Service checks.

Watford Borough Council is not a Children's Services Authority, therefore the scope for working directly with children and young people is limited.

Disclosure and Barring Service (DBS) checks can only be sought where their criteria is met. A list of the relevant posts are maintained and reviewed by Human Resources and, where necessary, the application of a DBS forms part of the safe recruitment process.

There is a group of employees for whom an enhanced Disclosure and Barring Service (DBS) check is necessary. This relates to services where there is a regulated activity, or regular contact which may be unsupervised such as where vulnerable adults are concerned. All posts are reviewed regularly.

It is a requirement of the Licensing of Hackney Carriages and for Personal Licenses that an enhanced DBS check forms part the application process. Details regarding this are contained within the relevant licensing policies available from the Licensing department at the Council which also contain a range of safeguarding measures.

Contracted, commissioned and grant funded organisations will need to undertake any checks commensurate with the level of their involvement with children, young people or adults at risk and have their own safe recruitment procedures.

10. Recognising potential incidences of abuse

It is not always easy to recognise a situation where abuse may occur or has already taken place even for those experienced in working with abuse cases. Watford Borough Council acknowledges its' members, employees, volunteers, grant funded and contracted services are not experts at such recognition.

There are however some indicators and areas of specific risk that are identified below and which also link to other policies. Further specific indicators of physical, sexual, emotional and psychological abuse are included in the procedure section of this document.

11. Domestic Abuse

Domestic abuse has been found to be a significant indicator of child abuse. Domestic Abuse is any incident, or pattern of incidents, of controlling, coercive and threatening behaviour or violence. A child may suffer from abuse not only by being physically abused directly, but also

seeing or hearing the maltreatment of another such as a parent or sibling. Watford Borough Council has a specific Domestic Abuse Policy that can be found on the Watford website³.

12. Child Sexual Exploitation

Sexual Exploitation is a form of sexual abuse, in which a young person is manipulated or forced into taking part in a sexual act. This could be as part of a relationship which seems to be normal and loving or in return for attention, affection, money, drugs, alcohol or somewhere to stay.

In many cases, victims will be 'groomed' by an abusing adult, who befriends them and makes them feel special by buying them gifts or giving them lots of attention. Usually the abuser will have power of some kind over the young person. It may be that they are older or more emotionally mature, physically stronger, or that they are in a position where they are able to control the young person.

This type of abuse could happen to any young person from any background. However, certain young people, such as those who are having difficulties at home, regularly go missing or who have experienced care, are more vulnerable.

Hertfordshire Safeguarding Children Partnership (HSCP) and Hertfordshire Probation Trust have joined forces with Hertfordshire Constabulary in Operation HALO to identify cases of child sexual exploitation in Hertfordshire and prosecute offenders⁴

13. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act 2003. **It is a form of child abuse and violence against women.** FGM comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons.

A further amendment to FGM Act 2003 by section 72 of the Serious Crime Act 2015 introduced FGM Protection Orders. An FGM Protection Order is a civil measure which can be applied for through a family court by a range of agencies including Local Authorities. The FGM Protection Order offers the means of protecting actual or potential victims from FGM under the civil law. Watford Borough Council follows the Hertfordshire protocol for FGM.

14. Forced Marriage

In forced marriage, one or both spouses do not consent to the marriage and some element of duress is involved. Duress includes both physical and emotional pressure and abuse.

³

<http://dennis/Docs/Documents/Forms/AllItems.aspx?RootFolder=%2FDocs%2FDocuments%2FHealth%20and%20Wellbeing%2FSafeguarding%20and%20Domestic%20Abuse%2FDomestic%20Abuse>

⁴⁴ <https://www.hertfordshire.gov.uk/services/childrens-social-care/child-protection/hertfordshire-safeguarding-children-partnership/hscp.aspx>

Forced marriage is primarily, but not exclusively, an issue of violence against females. Most cases involve young women and girls aged between 13 and 30, although there is evidence to suggest that as many as 15 per cent of victims are male. This policy relates to children or young people under 18 years of age.

Forced marriage is a human rights abuse. It can constitute both child abuse and sexual abuse. The United Nations considers it a form of trafficking, sexual slavery, and exploitation. It is not a private, personal, domestic, family, religious, or cultural issue and cannot be justified as such whether a religious or civil ceremony.

A clear distinction must be made between a **forced** marriage and an **arranged** marriage. The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the child/ young person.

In Watford we will follow the Hertfordshire County Council policy and procedure that should be followed in regards to any concerns about Honour Based Abuse and/or Forced Marriage.

15. Honour Based Abuse

The NPCC (National Police Chief's Council formerly ACPO) definition of Honour Based Abuse is "a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community". It is a form of domestic abuse which is perpetrated in the name of so called 'honour'.

16. Radicalisation and Violent Extremism.

The Counter Terrorism and Security Act 2015 requires Local Authorities to ensure that frontline staff should understand the Prevent Strategy and are able to recognise vulnerability to radicalisation, and know where to go to seek further help. Usual safeguarding procedures should be followed. Essential training is available for all staff via the Home Office website and face to face.

17. Capacity and Self Determination

Unless certain prescribed circumstances exist, adults should freely determine their own lives, take risks and make their own decisions. In legal terms, there is a presumption of capacity unless demonstrated otherwise.

Assumptions should not be made about a person's capacity eg. someone with dementia should not automatically be assumed to lack capacity. In some cases, capacity can fluctuate and a person can be deemed to have capacity to take responsibility for some decisions but not others.

There are two aspects to the issue of capacity within the context of abuse. Firstly, making assumptions about a person's capacity and denying them the right to self-determination may, in fact, be abusive. Secondly, where abuse has occurred or is suspected or alleged, the vulnerable person's capacity to understand and make decisions needs to be assessed.

Normally, the capacity of an individual to make key decisions is determined by their GP, Social worker and/or mental health team. Where a referral needs to be made for an assessment of an adult's capacity, then their consent needs to be obtained. If consent is withheld, then a judgement needs to be made with regard to whether the person lacks the capacity to make that decision. It is essential that an individual's capacity is considered at all times, if consent is withheld and a referral is made without considering capacity this would be deemed to be a breach of the Care Act 2014. Advice should be sought from designated safeguarding leads if you are unsure.

Before a safeguarding referral is made to HCC under this policy, the Council will seek the individual's consent. However, HCC state that "where an overriding public interest or vital interest or if gaining consent would put the adult at further risk, a concern must be raised but the lack of consent and the reason for it must be explicit". This must include the consideration of an individual's mental capacity.

This includes situations where:

- other people or children could be at risk from the person causing harm
- it is necessary to prevent crime
- there is a high risk to the health and safety of the adult at risk
- the person lacks capacity to consent
- the alleged abuser has care and support needs and may also be at risk
- staff, agents or contractors are implicated
- the adult at risk has mental capacity not to give consent but they may be under duress or being coerced
- a court order or other legal authority has requested the information
- where there is a need to take advice prior to notification or referral in relation to modern slavery or human trafficking

The adult at risk would normally be informed of the decision to refer and the reasons, unless telling them would jeopardise their safety or the safety of others".

18. Modern Slavery and Human Trafficking

Modern slavery is an umbrella term encompassing slavery, servitude, forced or compulsory labour and human trafficking. Victims of modern slavery are unable to leave their situation of exploitation, controlled by threats, punishment, violence, coercion and deception. Slavery violates human rights, denying people of their right to life, freedom and security.

The Modern Slavery Act 2015 introduced a range of measures to address this hidden crime and the following areas are specific to local authorities: -

Section 52 of the Modern Slavery Act 2015 requires local authorities, along with Police and Gangmasters Licensing Authority, to notify the Secretary of State upon developing

reasonable grounds to believe that a person may be a victim of slavery or human trafficking and in order to meet this requirement it is necessary to train staff frontline staff to recognise the indicators as they may find themselves in situations where they recognise the indicators of modern slavery or human trafficking and should be able to make the required notification.

Section 54 of this act deals with the transparency in supply chains and ethical procurement. It requires organisations with a global turnover in excess of £33 million to produce an annual statement in relation to this. The statement should detail what steps the business has taken to eradicate slavery from its own business and its supply chain or alternatively, because only the statement itself is compulsory, a statement could lawfully state that the business has taken no anti-slavery measures at all.

NOTE

It is important therefore to recognise that it is not Members, employees, volunteers, grant funded or contracted services responsibility to decide whether or not abuse of any kind is taking place, or if a child or adult is at risk, but to report where they have concerns or suspicions, or where an allegation has been made and be aware of what the signs could be.

In addition it is not the role of any Member, employee, volunteer, grant funded or contracted service to investigate or judge any allegation or concern.

It is everyone's responsibility is to REPORT concerns or allegations to the relevant officer Designated Safeguarding Officers should be advised of all referrals for the purposes of recording and reporting.

19. Responsibility, Monitoring and Review

The GroupHead of Service will be the lead for the safeguarding of children and young people.

This role is supported by the Safeguarding Manager.

All allegations of abuse will be centrally recorded and the Designated Safeguarding officers and their Managers will be responsible for collating and monitoring referrals and reporting these to the Council's Safeguarding Group.

Effective information sharing underpins integrated working and is a vital element of both early intervention and safeguarding.

We will comply with current legislation at all times when processing information about children and adults at risk. This includes the Data Protection Act 1998 and the General Data Protection Regulations which came into force in May 2018.

This policy will be reviewed on an annual basis.

PART TWO: PROCEDURE

SAFEGUARDING CHILDREN, YOUNG PEOPLE AND ADULTS AT RISK

1. Prevention

1.1. Safe Working Practice

When dealing with children, young people and adults at risk the corporate codes of conduct /customer care standards of behaviour should always be maintained as it is possible to reduce situations where abuse or allegations of abuse may occur.

As a Member, employee, volunteer, grant funded or contracted service provider (in this document this reference relates to those contracted service providers that have adopted this policy and procedure) you should apply best practice and follow these guidelines:-

- Where ever possible, always be publicly open when working with children and young people.
- Avoid any situations where you and a child are completely unobserved (encourage an open environment).
- Never leave children and young people unattended whilst they are in your care;
- Wear a name badge, employee identification badge and/or uniform to be easily recognised by children, young people and adults at risk
- You must respect the rights, dignity and worth of every person and treat everyone equally within the context of their activity or the service they undertake with the Council.

Members, employees, volunteers grant funded and contracted service providers should never in the course of their duties:

- Engage in rough, physical and sexually provocative games or activities;
 - Share a bedroom with a child or young person;
 - Allow or engage in any form of inappropriate physical contact;
 - Allow children or young people to use inappropriate language unchallenged.
 - Make sexually suggestive comments to a child or young person even in fun.
 - Allow allegations made by a child or young person to go unchallenged, unrecorded or not acted upon.
 - Do things of a personal nature that a child can do for themselves.
 - Enter areas designated only for the opposite sex.
 - Solicit personal information other than that required for health and safety reasons, such as data required for registration purposes to attend facilities or applications for courses etc. on courses. This information must be dealt with in accordance with the requirements of all current Data Protection legislation.
 - Become involved in the administration, prompt, storage or ordering of an individual's medication.
-

- Become involved in any financial transaction with, or on behalf of, a child, young person or adult at risk.
- Provide any personal care to an adult at risk. This includes helping them to get dressed.
- Take a child young person or adult at risk in their car.
- Access an individual's property without permission

Occasions may arise where an employee and/or volunteer does things of a personal nature for a child or young person particularly if they are very young or have disabilities. These duties should only be carried out within the boundaries of the role and with appropriate training and with the full understanding and consent of parents/carers and the child/young person involved.

If a child, young person or adult at risk is accidentally injured as a result of your actions, seems distressed in any manner, misunderstands or misinterprets something you have done, such incidents should be reported immediately to your line manager and documented. In the case of children and young people parents/carers should be informed of all incidents.

All Members, employees, volunteers, grant funded or contracted service providers should be aware that they should not be in a situation where they are ever alone with a child and to always have a responsible adult or other children or young people with them in a group.

To be aware they do not:

- Spend any time alone with children and young people away from others.
- When talking to children on your own ensure you can be seen by others.
- Take children or young people alone on car journeys, however short.
- Take children or young people to your home where they will be alone with you.

1.2. Safe working procedures

Good standards of maintenance, hygiene and safety should be maintained at all times within Council buildings where children, young people and adults at risk use and have access to our services.

In order to support its Health and Safety Policy the Council ensures that general safety arrangements are supplemented by comprehensive safe working procedures within each service area.

Such procedures will incorporate an identification of hazards, assessment of risks, and use of personal protective equipment, training, supervision and safe systems of work. These will be regularly reviewed by responsible officers.

1.3. Operational Procedures and Standards

The safety of children, young people and adults at risk taking part in any meeting/activity and/or organised session on Council premises is paramount. If children, young people or adults at risk are attending Council premises or events without the supervision of a parent/carer/guardian, the following practices must be applied: -

All children and young people must be supervised at all times by an employee or volunteer who has undergone the appropriate DBS disclosure.

- Standard risk assessments are conducted prior to the organisation of any meetings, courses or activities.
- All employees, volunteers, members or contracted services must be aware of the procedure for the arrival and departure at any meeting/activity/course undertaken with the Council and any particular control measures identified in the risk assessment process.
- Any Supervisor or volunteer working with children, young people or adults at risk should familiarise themselves with the emergency evacuation procedures relevant to the area in which they work and take responsibility for those children and young people should an emergency arise.
- A DBS checked employee/volunteer must accompany a child, young person or adult at risk should they wish to leave the main group for whatever reason (e.g. first aid).
- All relevant safety checks must be made on the facilities and equipment prior to the start of each day or session.
- Parental consent should be sought
- All emergency contact details/medical information must be kept current for each child or young person.
- The correct ratio of adults to children and young people should be applied as published in guidelines by Ofsted.

Notwithstanding the above procedures, there will be a need for specific operational procedures relative to each site, service and activity.

1.4. First Aid and accidents

The welfare of children, young people and adults at risk is paramount. For children and young people parental consent for the administration of first aid is not always possible or necessary but without the relevant consent it must be a last resort.

For adults at risk first aid should also be seen as the last resort. It is the decision of the individual as to whether or not they would carry out first aid.

All accidents and incidents must be recorded in accordance with the Councils accident reporting procedures.

1.5. Photography

When taking photographs of any child or young person precautionary measures should be taken and the appropriate authority sought from parents or guardians.

When taking photographs of any adult at risk, consent should be sought.

1.6. Off Duty Contact

Employees, elected Members, volunteers grant funded organisations and contractors must maintain a professional relationship with children, young people and adults at risk during any off-duty contact, continuing to follow the guidelines and policies set out for contact during work and where relevant should adhere to the ICT usage guidance.

1.7. Breach of safe working practice and procedures

Watford Borough Council takes its responsibility very seriously. Employees who breach any of the code above will result in investigation and may be a matter of disciplinary action which could lead to dismissal and the possibility of criminal investigation where there is evidence of illegal activity. Where an investigation results in dismissal the Disclosure and Barring Service will be informed where relevant.

Volunteers in breach of the above will have their services terminated with immediate effect. Where there is evidence of illegal activity, the volunteer will be reported to the relevant authorities and may face criminal investigation.

If a Member does not adhere to the policy, there may be grounds for reporting their behaviour to the Standards Committee, who may require an investigation under the Member Code of Conduct. Where there is evidence of illegal activity, the Member will be reported to the relevant authorities and may face criminal investigation.

2. Recognise, Respond, Refer

2.1. Recognise - How?

It is not the role of any Member, employee, and volunteer, grant-funded or contracted service provider to take individual responsibility for deciding whether or not abuse is actually taking place. However, there is a responsibility to protect children, young people and adults at risk by referring concerns to the appropriate agency.

This procedure for reporting a concern or allegation informs all Watford Borough Council, Members, employees, volunteers, grant funded or contracted service providers (that have adopted this policy and procedures) of the actions they should take if they have concerns about, or encounter, a case of alleged or suspected abuse of a child, young person or adult at risk.

Recognising a safeguarding concern can also relate to the environment that a child, young person or adult at risk is living in and this is often referred to as neglect. Visiting Officers may have concerns about what they see when carrying out an inspection or home visit to a property or whilst carrying out their duties.

Some of the more obvious signs of abuse, neglect or bullying could be:

- Unexplained bruising, marks or injuries on any part of the body
- Bruises which reflect hand marks or fingertips (from slapping or pinching)
- Cigarette burns
- Bite marks
- Constant hunger, sometimes stealing food
- Constantly dirty or smelly condition
- Inappropriate dress for conditions
- Fear of parents or carers being approached for explanations
- Aggressive behaviour or severe temper outbursts
- Flinching when approached or touched
- Reluctance to get changed, for example long sleeves in hot weather
- Neurotic behaviour e.g. Rocking, hair twisting
- Being unable to play or withdrawing from social situations
- Fear of making mistakes
- Self-harm
- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Sexual knowledge which is beyond their development age
- Sexual drawings or language
- Saying they have secrets they cannot tell anyone about
- Not allowed to have friends or socialise with others
- Neglect – unacceptable living conditions

2.2. Child Sexual Exploitation

In addition to the above the following signs can be a sign of child sexual exploitation which can take place up to the age of 18 years old.

- Regularly going missing from home
- Truancy from school
- Friends with significantly older people
- Being collected from home or school by people you don't know
- Unexplained injuries of bruising
- Unexplained gifts or money
- Secretive mobile phone use
- Sexually transmitted infections
- Associating with other young people who are vulnerable or are known to be involved in sexual exploitation
- Drug or alcohol misuse
- Evidence of sexual bullying or vulnerability through the internet or social networking
- Self-harming
- Suicide attempts

- Overdosing
- Eating disorders
- Cannot account for money in their possession
- Association with known gang members or older males

Tackling Child Sexual Exploitation and 'Say Something If You See Something' are national campaigns. Safeguarding Children and Young People from Sexual Exploitation, HM Government 2009 tells us "Sexual exploitation is not limited to particular geographical areas and all Local Safeguarding Children Boards should assume it is an issue in their area".

2.3. Forced Marriage and Honour Based Abuse

The honour code to which forced marriage and honour based abuse refers to is usually set at the discretion of male relatives and girls or women who do not abide by the 'rules' are then punished for bringing shame on the family. Infringements may include a woman or girl having a boyfriend; rejecting a forced marriage; pregnancy outside of marriage; interfaith relationships; homosexuality perceived inappropriate dress or make-up and even kissing in a public place. Crimes of honour do not always include violence, it can occur in many forms including:-

- domestic abuse/assault
- Attempted/ conspiracy to commit murder
- Manslaughter
- Procuring an abortion
- Encouraging or assisting suicide
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against their will

NOTE

It is very important that you do not speak to any family members if you have concerns about forced marriage or honour based abuse. You should speak to the designated officer immediately

2.4. Female Genital Mutilation

The FGM Act 2003 was amended by the Serious Crime Act 2015 and it introduces a mandatory reporting duty which requires regulated health and social care professionals and teachers in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police.

'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical

signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act 2003.

Members, employees, volunteers and grant funded or contracted service providers are not subject to this mandatory duty but this policy expects them to follow the duty as a matter of good practice and any concerns should be reported to the designated officer.

2.5. Prevent – Radicalisation and Violent Extremism

Radicalisation is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups.

Children, young people and adults at risk are vulnerable to exposure to or involvement with groups or individuals who advocate violence as a means to a political or ideological end. Examples of extremist causes that have used violence to achieve their ends include animal rights, the far right and international terrorist organisations such as so called Islamic State (IS).

Children, young people and adults at risk can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with groups and organisations or, increasingly through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Work to safeguard children and adults, providing early intervention to protect and divert people away from being drawn into terrorist activity, is at the heart of the revised *Prevent* strategy. Channel is a national programme which forms part of Prevent. More information can be found in the Channel Duty Guidance⁵ provided by Government.

Potential indicators identified in the Channel guidance include: -

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- The expression of the extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

2.6. Financial abuse – Adults at risk

5

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf

There is no statutory definition of financial abuse; however *No Secrets* published by the department of health defines financial abuse as the following:

“Financial or material abuse, including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits”

(DH/Home Office, 2000)

Indicators of financial abuse can include:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person’s financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person’s living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repair

2.7. Modern Slavery and Human Trafficking

There are a wide range of indicators relating to modern slavery and human trafficking which can be found on the link below.

If a member of staff has any concerns about any matter related to slavery they should discuss it with the designated officer as there is a duty for them to notify to home office and a structured procedure to follow.⁶

⁶ <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

2.8. Dealing with threats of suicide

The underlying causes of suicidal feelings are likely to be a complex mix of personal and social factors and fortunately not something that is a normal part of the usual working day. That said there are occasions when officers are confronted with a statement from an individual that they intend to harm themselves or take their own life.

Some residents/customers/service users are already accessing support from us or other agencies but if a person tells you that they are going to, or feel like they are going to, take their own life then we should deal with them by: -

- Taking their statement seriously
- Asking if they are receiving any support i.e GP, CPN, mental health team or any other agency and recording the details.
- Asking if there is family support and if so who they are and their contact details.
- Giving them the number of the Samaritans and telling them we will be contacting the police.
- If the threat is considered or believed to possibly be genuine informing the local police (tel:101) who have the resources to check that they are OK at an immediate level. In an emergency call 999.

If a threat of suicide is received initial action should be taken and then a Safeguarding form completed and forwarded to the safeguarding mailbox. The safeguarding team will make a decision on any further referral that may be required.

NOTE

If you have any concerns about any situation or a discussion with a child, young person or adult at risk always speak to your Designated Safeguarding Officer or a Lead Safeguarding Officer – see Intranet for contact details. Remember it is not your responsibility to make any decisions or investigations – it is your responsibility to respond and refer by discussing with a Designated Officer.

The form and further guidance are available at Suicide Prevention Network on the Intranet.

3. Respond and refer – How?

To a child, young person or adult at risk disclosing

Children, young people and adults at risk who are being abused will only tell people they trust and with whom they feel safe. By listening to, and taking seriously what a child, young person or adult at risk is telling you, you will already be helping to protect them.

Create a safe environment by:

- Staying calm and not rushing into actions that may be inappropriate.
- Confirming you understand how difficult it must have been to confide in you and that they have done the right thing.
- Reassuring the child, young person or adult at risk and stressing he/she is not to blame.
- Listening to what the child, young person or adult at risk tells you, show you are taking what is being said seriously.
- Where possible remain in view, do not go somewhere on your own.
- Be honest and do not make promises you cannot keep. Explain you will have to tell other people in order to stop what is happening;
- Ensure you are quite clear about what the child, young person or adult at risk says so you can pass it on to the professionals. Use open questions to encourage them to use their own words but do not press for detailed information.

NOTE

The law is very strict and an abuse case can be dismissed if it appears the child/young person has been led or words have been suggested.

Record exactly what the child, young person or adult at risk has said to you, on a referral form as soon as possible after the incident. As far as possible use the child, young person or adult at risk own words. Stick to the facts and do not give your opinion and record:

- The individual's name, address, date of birth.
- The nature of the allegation.
- A description of any visible bruising or other injuries.
- Your observations (e.g. a description of the individual's behaviour and physical and emotional state).
- Exactly what the child, young person or adult at risk has said and what you said. Record the account of what has happened and how any bruising or other injuries occurred.
- Any action you took as a result of your concerns (e.g. who you spoke to and resulting action, including any contact with your immediate line manager, internal protection officer). Where possible include names, addresses and telephone numbers;
- Sign and date what you have recorded.
- The form should then be given to the appropriate designated officer for the safeguarding of children, young people and adults risk in the first instance.
- **Do not** take sole responsibility – consult the designated officer in your service area or in their absence one of the designated lead officers should be contacted.

Where there are concerns regarding child sexual exploitation or radicalisation always discuss with the designated Lead Officers or the Community Safety Managers.

NOTE

In determining your actions, remember that only experienced and specifically qualified and trained professionals should deal with cases or suspicions relating to abuse. Your role is to recognise, respond and refer to your designated officer.

All referrals must be reported to the Designated Lead Safeguarding Officers in the relevant team via the Safeguarding email address for recording, monitoring and reporting purposes.

4. Allegations against members, employees, volunteers or contracted service providers.

Should an employee, elected member, volunteer or contracted service provider become aware of an allegation (against a colleague) of an incident of abuse taking, or having taken place, it is vital that the following procedures are followed:

- Take the allegation seriously. It is your duty to consider any allegation to be potentially dangerous to the child/young person or adult at risk and therefore report it
- Make a written record on of any details of which you are aware, as part of your report.
- Do not approach the alleged perpetrator or the alleged victim yourself.
- Report the allegation to your designated officer or to the Lead Safeguarding Officer by completing the referral form giving details of the allegation, how you became aware of it and any other relevant details and email it to the Safeguarding mailbox.
- Referrals to the Hertfordshire Safeguarding team should be made on their form which can be found on the Council's Document Centre under the Safeguarding heading and sent to the Protected Referrals email address.
- In a case where your manager may be involved, report it to the Lead Safeguarding Officer, Group Manager directly and/or the Group Manager for People who is the senior officer for Human Resources. It is likely that they will need to get advice and support from the Local Authority Designated Officer (LADO) at Hertfordshire County Council

Do not judge or investigate. As an employee, elected member, volunteer or contracted service provider it is important not to lose focus of your role. By reporting an allegation quickly, any necessary investigations and/or judgement can then be made by trained professionals;

It is paramount that you maintain confidentiality throughout this whole process. It is extremely important that any allegations are not discussed (unless absolutely necessary and only with specified persons) as any breaches could be damaging to both the alleged perpetrator, the child/young person and to any investigation that may follow.

Once the incident has been reported to the designated officer or Lead Safeguarding Officer they will inform Human Resources and the report will be suitably investigated. The Council's Conduct Procedure will be followed and, where appropriate, other relevant agencies such as the police and/or the Disclosure and Barring Service will be informed

5. Dealing with other allegations

Should an employee, elected Member, volunteer or contracted service provider be informed by a third party that an incident of abuse may be occurring the procedure outlined above will apply. In no circumstances should you attempt to contact the alleged victim or the alleged perpetrator yourself. Your role is to recognise and report any concern to your designated officer or to one of the Lead Safeguarding Officers.

6. ICT including Internet and email

The Adventure Playgrounds have a specific policy on e-safeguarding which relates to the children and young people who are service users which is visible to them and reviewed on a regular basis.

For Watford Borough Council systems please refer to Watford Borough Council's IT policies and refer any concerns to the designated Safeguarding Officers.

7. Complaints

Complaints about general service issues should be dealt with through the Council's corporate complaints procedures. Any complaint that makes a specific reference to concerns about a specific child, young person or adult at risk and their welfare should be dealt with through the safeguarding procedure in the first instance. Where it is not clear where the responsibility lies the matter should be referred to one of the designated Lead Safeguarding Officers who will advise.

8. Dealing with malicious accusations

Reports found to be malicious about an employee(s) and/or serious and/or persistent abuse of these safeguarding policies and procedures by relevant persons will not be tolerated and will be dealt with through Watford Borough Council's Human Resources Policies and procedures. If there is evidence of illegal actions the Police will be informed.

9. Confidentiality

When dealing with any case/suspicion/allegation relating to abuse, confidentiality is of the highest importance as any breaches can have severe consequences and the protection of the persons involved is paramount.

It is important that only those persons who need to know are given the relevant information to protect the rights of the victim and alleged perpetrator. Employees, Members, volunteers and contracted service providers **must not:**

- Discuss any allegation of abuse of bullying, substantiated or not, with anyone from Watford Borough Council other than a designated Safeguarding Officer, Lead Safeguarding Officer or Director.
- Discuss any allegations of abuse or bullying, substantiated or not, with any member of an external agency, other than as part of a formal investigation.
- Discuss any allegation of abuse or bullying, substantiated or not, with any other interested party, including parents, carers and relatives of the child, or young person without the express permission of the person with overall responsibility for the investigation. This person may be part of the Hertfordshire Safeguarding Team.

This does not exclude any employee from the need or right to consult with a solicitor, trade union representative or other bona fide legal adviser.

NOTE

Please make yourself aware of the Council's Whistle Blowing Policy document which is available on the intranet.

10. Sharing of information

Employees, Members, Volunteers, grant funded or contracted service providers may be anxious about the legal and ethical restrictions on sharing information, particularly with other agencies. However, the sharing of information for the purposes of safeguarding and promoting the welfare of children, young people and adults at risk is essential. In many cases it is only when information from a range of sources is put together that a risk of harm can be seen.

The main legal gateways for disclosure of information are:

- Common law duty of confidence
- Human Rights Act 1998
- Data Protection Act 2018
- Crime and Disorder Act 1998
- The General Data Protection Regulation (GDPR) (Regulation (EU) 2016

Each of these areas needs to be considered separately. Other statutory provisions may also be relevant but in general the law will not prevent you from sharing information with other practitioners if:

- Those likely to be affected consent
- The public interest in safeguarding the child or young person's welfare override the need to keep the information confidential
- Disclosure is required or necessary under a court order or other legal obligation.
- It is for the prevention or detection for crime and disorder.

Sections 27 and 47 of the Children Act 1989 enables local authorities to request help from specified authorities (other local authorities, education authorities, housing authorities, NHS bodies) and place an obligation on those authorities to co-operate. A request could be for information in connection with an s17 assessment or an s47 enquiry. Neither provision would require an unjustified breach of confidence. But an authority should not refuse a request without considering all the circumstances.

Clause 45 of the Care Act 2014 focuses on 'supply of information'. This relates to the responsibilities of others to comply with requests for information from the safeguarding adults' board.

The statutory guidance to the Care Act emphasises the need to share information about safeguarding concerns at an early stage; information-sharing agreements or protocols should be in place.

Designated Safeguarding officers in the local authority and its partner agencies are responsible for ensuring that information shared about individuals alleged to have caused harm is in accordance with human rights, data protection and confidentiality requirements.

Section 115 of the Crime and Disorder Act 1998 enables any person to disclose information to a relevant authority for any purposes of the Act if they would not otherwise have the power to do so. Relevant authorities include local authorities, NHS bodies and police authorities. The purpose of the Act broadly covers the prevention and reduction of crime and the identification or apprehension of offenders.

All copies of the Safeguarding Reporting Form must be sent to and retained by the Designated Safeguarding Officers. These documents must be stored securely to ensure confidentiality and will be retained in accordance with Retention Policy Periods as defined in the organisations retention schedule. No other copies should be kept.

Full guidance on information sharing and myth busting can be found in the government guidance "Advice for practitioners providing safeguarding services to children, young people and carers"⁷ and "Practice Guidance on sharing adult safeguarding information"⁸ published by the Social Care Institute for Excellence (SCIE)

11. Dealing with the Media

All enquiries from the media regarding specific Safeguarding issues must be dealt with through one of the Lead Safeguarding Officers and the Team Leader – Communications or Group Manager, People.

12. Safe Recruitment, Contracts, Grants and Commissioning.

All recruitment and selection activity is required to comply with the Council's Recruitment and Selection Code of Practice and the Disclosure and Barring Service Policies.

⁷

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/information_sharing_advice_practitioners_safeguarding_services.pdf

⁸ <https://www.scie.org.uk/care-act-2014/safeguarding-adults/>

It is the policy of the Council that no person shall work or volunteer to work with children and young people within or on behalf of Watford Borough Council who has been convicted or who has received a formal Police caution concerning an offence against children.

There is a list of posts for which Disclosure and Barring checks are required and under no circumstances should an employee commence work until the checks have taken place. Disclosure and Barring (DBS) checks are also compulsory for volunteers where the criteria are met.

The Council also has a duty to protect any young people who undertake work, whether temporary, part time or full time for the Council. Students and schoolchildren under 18 years including those engaged in work experience are covered by the Health and Safety at work regulations.

For all contracted, commissioned, grant funded services, a risk assessment will be taken regarding the availability and the implementation of appropriate safeguarding policies and procedures. Contracts and grants will be awarded when the Council is assured that satisfactory checks have been undertaken where appropriate. This will form part of the contract/tender/application process.

In addition to the initial checks, ongoing monitoring of continued compliance will be made and information relating to the following areas will be required on a regular basis: -

- Numbers of referrals to Hertfordshire County Council call centre/protected referrals
- Numbers of staff who have/have not been trained or had refresher training
- Details of training provided – is the training approved by Hertfordshire Safeguarding Children's Partnership
- Have a safe recruitment policy

6. Induction and training

Before a new employee starts their employment with Watford Borough Council they will be asked to read the Safeguarding Policy and Procedures and sign to acknowledge this.

Basic Safeguarding Awareness training will be provided as compulsory training for all employees and members as part of the formal induction process – this training is available as an e learning package on the Intranet.

This will also apply to volunteers, grant funded and contracted service providers where this policy is adopted or agreed as agreed as part of the contract/grant/commissioning process.

Safeguarding and the Promotion of Welfare of Children and Young People training will be provided to all staff that have any level of interaction with children and young people within their job role. Safeguarding adults at risk training will be provided to all staff who have a level of interaction with adults at risk.

All front line staff will attend the Workshop Raising Awareness of Prevent training and all relevant services will receive training to raise awareness of indicators of modern day slavery and how to make the appropriate notification.

Employees, volunteers, contracted service providers and members whose work brings them into significant contact with Children, young people or adults at risk will undertake the relevant level of Child Protection and safeguarding training which should be identified by team leaders and lead officers at appraisals. Advice on this can be given by the Designated Lead Officers.

Managers, Team Leaders, Employees and volunteers should be aware of their role and responsibilities under these procedures and be aware of the need to keep the training up to date. If there are any queries or if any advice is required regarding the level or type of training, please consult the Designated Lead Officer for advice

7. Review

This policy and procedures will be updated annually and fully reviewed every 3 years. The next full review will be June 2021 or in response to changes in good practice or legislation.

Appendix 1 Useful resources and other statutory guidance

[Working Together to Safeguard Children 2018](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Information Commisioners (ICO) website

<https://ico.org.uk/>

What to do if you're worried a child is being abused- advice for practitioners

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

| | | |
|-----------------------|---|----------------------|
| Child Line | - | 080011 11 |
| NSPCC Helpline | - | 0808 800 5000 |

WATFORD BOROUGH COUNCIL SAFEGUARDING POLICY

DECLARATION

Watford Borough Council is fully committed to safeguarding the well-being of children, young people and adults at risk and promoting their welfare.

Working as an employee, volunteer or contracted service provider of Watford Borough Council, or representing Watford Borough Council as an Elected Member, it is important that you have taken the time to thoroughly read the Safeguarding Policies and Procedures documents.

By being made aware of the policy it is our intention to ensure that we all are proactive in providing a safe and secure environment for the children, young people and adults at risk in our community.

.....

Declaration:

Having read and understood Watford Borough Council’s Safeguarding Policies and Procedures documents, I accept the principles therein.

Signed: _____

Name (please print): _____

Position in organisation: _____

Date: _____